

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Highfields Capital Ltd., Highfields Capital I LP,
and Highfields Capital II LP,

Plaintiffs,

V.

SCOR, S.A.,

Defendant.

Civil Action No. 04-10624-MLW

JOINT MOTION TO APPROVE STIPULATION AND PROTECTIVE ORDER

Plaintiffs Highfields Capital, Ltd, Highfields Capital I LP, and Highfields Capital II LP (“Highfields”) and defendant SCOR, S.A. (“SCOR” and together, the “Parties”) jointly move for the Court’s approval of the Parties’ Stipulation and Protective Order in the form attached hereto as Exhibit A. As grounds therefor, the Parties state that the Stipulation and Protective Order is necessary to protect confidential and proprietary business information that the Parties expect will be disclosed in the course of discovery and, thereby, to facilitate pre-trial discovery and the orderly and efficient adjudication of the litigation. The Parties submit that the form and terms of the Stipulation and Protective Order are based upon, and substantially similar to, those routinely agreed upon and entered in commercial litigation.

WHEREFORE, the Parties respectfully request that the Court approve the Stipulation and Protective Order attached hereto as Exhibit A as an order of the Court.

Respectfully submitted,

HIGHFIELDS CAPITAL LTD.,
HIGHFIELDS CAPITALS I LP, and
HIGHFIELDS CAPITAL II LP,

By their attorneys,

/s/ Joshua A. McGuire

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By its attorneys,

/s/ Douglas H. Meal

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Dated: February 10, 2006